

EXHIBIT 5

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
3

4 * * * * *

5 THE CITY OF HUNTINGTON,

6 Plaintiff,

7 vs.

 CIVIL ACTION
 NO. 3:17-01362

8 AMERISOURCEBERGEN DRUG
9 CORPORATION, et al.,
10 Defendants.

11 CABELL COUNTY COMMISSION,
12 Plaintiff,

13 vs.

 CIVIL ACTION
 NO. 3:17-01665

14 AMERISOURCEBERGEN DRUG
15 CORPORATION, et al.,

16 Defendants.

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19 Videotaped and videoconference deposition
20 of CONNIE PRIDDY taken by the Defendants under the
21 Federal Rules of Civil Procedure in the above-
22 entitled action, pursuant to notice, before Teresa
23 S. Evans, a Registered Merit Reporter, at the
24 Mountain Health Arena, One Civic Center Plaza,
 Huntington, West Virginia, on the 13th day of July,
 2020.

1 heroin, I thought, "There is no way that is
2 happening, because people don't use heroin."

3 And then I realized that the brain
4 science behind it, once you are addicted to an
5 opioid and your source dries up, that you are going
6 to use something that's much more readily
7 available.

8 So that was probably in 2005 to 2010.

9 Q. Had there been heroin usage in Huntington
10 and Cabell County before 2005 or 2010?

11 A. Not that I was aware of. But I certainly
12 wasn't on the front lines, because I was flying on
13 the helicopter.

14 Q. So whether it was happening or not
15 happening, you just --

16 A. Exactly.

17 Q. -- don't know. Do you know of any
18 statistics that are kept about what drug a person
19 starts using -- you know, you just made the comment
20 about the source of opioids dries up and somebody
21 goes to heroin.

22 Do you know of any statistics that
23 would tell us what drug a person starts on?

24 A. And this is just from the experience of

1 they're going to try to fulfill that need somewhere
2 else.

3 Q. And what is the basis of that statement?
4 What's the data that you would rely on for that
5 statement that if people can't get -- if their
6 access to legal -- legally-prescribed opioids is
7 cut off, they will go to illegal street drugs?

8 A. Based on just the limited research that I
9 have done, is that once you have that level of
10 dependence, you are sick physically if you do not
11 fulfill that, and that you are going to turn to the
12 streets to get it.

13 So as a disease process, you're going
14 to have vomiting, you're going to have diarrhea,
15 you're going to have muscle cramps, you're going to
16 have tremors, and you're going to do something to
17 get those.

18 And if you can't, then -- if you can't
19 get somebody to prescribe it for you and you can't
20 get it filled through a prescription, you're gonna
21 turn to something that's readily available, and
22 most times cheaper.

23 Q. And -- but you've told us earlier that you
24 don't have data that would tell us here in

1 Huntington and Cabell County what percentage of
2 people using illegal drugs started with a legal
3 drug?

4 A. I do not have that as a data point, you are
5 correct.

6 Q. All right.

7 A. That was just anecdotal per our clients
8 interviewed.

9 Q. All right. And then -- so the next slide
10 that talks about pill mills --

11 A. Uh-huh.

12 Q. -- and it looks like it quotes some --
13 perhaps some news articles about pill mills and
14 their impact on the increase in overdoses and
15 deaths caused by illegal -- or by drug use.

16 Is that what that's supposed to be
17 talking about?

18 A. He's got quotes from newspapers, so I'm
19 assuming that that is to substantiate that there
20 were pill mills in this area. That would all I
21 would really be able to --

22 Q. All right. And it looks like that's --
23 pill mills is included as one of the three major
24 issues identified and addressed on these -- talking